

## EXHIBIT A

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2 CRAIG C. CORBITT (83251)  
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12 *Interim Lead and Liaison Counsel for*  
13 *Indirect Purchaser Class*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**

13 IN RE STATIC RANDOM ACCESS  
14 MEMORY (SRAM) ANTITRUST  
15 LITIGATION

Case No. M:07-CV-01819-CW

MDL No. 1819

16 This Document Relates to:

17 ALL INDIRECT PURCHASER ACTIONS

18 **CORRECTED DECLARATION OF**  
19 **CHRISTOPHER T. MICHELETTI IN**  
20 **SUPPORT OF INDIRECT PURCHASER**  
21 **PLAINTIFFS' MOTION FOR CLASS**  
22 **CERTIFICATION**  
23 **(REDACTED VERSION)**

Date: September 3, 2009

Time: 2:00 p.m.

Courtroom: 2, 4<sup>th</sup> Floor

Judge: Hon. Claudia Wilken

24 I, Christopher T. Micheletti, declare:

25 1. I am a member in good standing of the State Bar of California and am a member of  
26 the firm Zelle Hofmann Voelbel & Mason LLP. I am duly licensed to practice before the Supreme  
27 Court of the State of California and all other inferior courts of this State. I am admitted to practice  
28 before the United States Supreme Court, the Court of Appeals for the Ninth Circuit, and the Federal  
District Court for the Northern District of California. I am also admitted to practice before the  
United States Court of Appeal for the Sixth Circuit. This Declaration is based on personal

1 knowledge, except where specified that information is based on information and belief, and if called  
2 to testify, I could and would do so competently as to the matters set forth herein.

3 2. Attached as Exhibit 1 hereto are true and correct copies of excerpts of Plaintiff Lara  
4 Sterenberg's responses to Defendants' Interrogatories; excerpts of her deposition testimony; and  
5 invoice(s), receipt(s), and/or other records produced by her in this action.

6 3. Attached as Exhibit 2 hereto are true and correct copies of excerpts of Plaintiff United  
7 Food and Commercial Workers Local 99's deposition testimony; and invoice(s), receipt(s), and/or  
8 other records produced by it in this action.

9 4. Attached as Exhibit 3 hereto are true and correct copies of excerpts of Plaintiff Robert  
10 S. Harmon's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
11 invoice(s), receipt(s), and/or other records produced by him in this action.

12 5. Attached as Exhibit 4 hereto are true and correct copies of excerpts of Plaintiff  
13 Michael Brooks's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
14 and invoice(s), receipt(s), and/or other records produced by him in this action.

15 6. Attached as Exhibit 5 hereto are true and correct copies of excerpts of Plaintiff  
16 Lawrence Markey's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
17 and invoice(s), receipt(s), and/or other records produced by him in this action.

18 7. Attached as Exhibit 6 hereto are true and correct copies of excerpts of Plaintiff  
19 Roman J. Munoz's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
20 and invoice(s), receipt(s), and/or other records produced by him in this action.

21 8. Attached as Exhibit 7 hereto are true and correct copies of excerpts of Plaintiff Joseph  
22 Solo's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and invoice(s),  
23 receipt(s), and/or other records produced by him in this action.

24 9. Attached as Exhibit 8 hereto are true and correct copies of excerpts of Plaintiff  
25 Stargate Films's responses to Defendants' Interrogatories; excerpts of its deposition testimony; and  
26 invoice(s), receipt(s), and/or other records produced by it in this action.

27 10. Attached as Exhibit 9 hereto are true and correct copies excerpts of Plaintiff United  
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1 Food and Commercial Workers Local 8's deposition testimony; and invoice(s), receipt(s), and/or  
2 other records produced by it in this action.

3 11. Attached as Exhibit 10 hereto are true and correct copies of excerpts of Plaintiff Dona  
4 Culver's responses to Defendants' Interrogatories; excerpts of her deposition testimony; and  
5 invoice(s), receipt(s), and/or other records produced by her in this action.

6 12. Attached as Exhibit 11 hereto are true and correct copies of excerpts of Plaintiff  
7 Ronnie Barnes's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
8 invoice(s), receipt(s), and/or other records produced by him in this action.

9 13. Attached as Exhibit 12 hereto are true and correct copies of excerpts of Plaintiff Ryan  
10 Edwards's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
11 invoice(s), receipt(s), and/or other records produced by him in this action.

12 14. Attached as Exhibit 13 hereto are true and correct copies of excerpts of Plaintiff John  
13 Pharr d/b/a JP Micro's responses to Defendants' Interrogatories; excerpts of his deposition  
14 testimony; and invoice(s), receipt(s), and/or other records produced by him in this action.

15 15. Attached as Exhibit 14 hereto are true and correct copies of excerpts of Plaintiff  
16 Ramon Oyadomari's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
17 and invoice(s), receipt(s), and/or other records produced by him in this action.

18 16. Attached as Exhibit 15 hereto are true and correct copies of excerpts of Plaintiff Unite  
19 Here Local 5's responses to Defendants' Interrogatories; excerpts of its deposition testimony; and  
20 invoice(s), receipt(s), and/or other records produced by it in this action.

21 17. Attached as Exhibit 16 hereto are true and correct copies of excerpts of Plaintiff  
22 Herbert Harmison's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
23 and invoice(s), receipt(s), and/or other records produced by him in this action.

24 18. Attached as Exhibit 17 hereto are true and correct copies of excerpts of Plaintiff  
25 David Sly's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
26 invoice(s), receipt(s), and/or other records produced by him in this action.

27 19. Attached as Exhibit 18 hereto are true and correct copies of excerpts of Plaintiff nXio,  
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1 LLC's responses to Defendants' Interrogatories; excerpts of its deposition testimony; and invoice(s),  
2 receipt(s), and/or other records produced by it in this action.

3 20. Attached as Exhibit 19 hereto are true and correct copies of excerpts of Plaintiff  
4 Penobscot Eye Care's responses to Defendants' Interrogatories; excerpts of its deposition testimony;  
5 and invoice(s), receipt(s), and/or other records produced by it in this action.

6 21. Attached as Exhibit 20 hereto are true and correct copies of excerpts of Plaintiff  
7 James Allen's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
8 invoice(s), receipt(s), and/or other records produced by him in this action.

9 22. Attached as Exhibit 21 hereto are true and correct copies of excerpts of Plaintiff  
10 Fairmont Orthopedics and Sports Medicine, P.A.'s deposition testimony; and invoice(s), receipt(s),  
11 and/or other records produced by it in this action.

12 23. Attached as Exhibit 22 hereto are true and correct copies of excerpts of Plaintiff  
13 Reclaim Center, Inc.'s responses to Defendants' Interrogatories; excerpts of its deposition testimony;  
14 and invoice(s), receipt(s), and/or other records produced by it in this action.

15 24. Attached as Exhibit 23 hereto are true and correct copies of excerpts of Plaintiff  
16 Henry Kornegay's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
17 and invoice(s), receipt(s), and/or other records produced by him in this action.

18 25. Attached as Exhibit 24 hereto are true and correct copies of excerpts of Plaintiff Our  
19 Montana, Inc.'s responses to Defendants' Interrogatories; excerpts of its deposition testimony; and  
20 invoice(s), receipt(s), and/or other records produced by it in this action.

21 26. Attached as Exhibit 25 hereto are true and correct copies of excerpts of Plaintiff  
22 Culinary Workers Union Local 226's deposition testimony; and invoice(s), receipt(s), and/or other  
23 records produced by it in this action.

24 27. Attached as Exhibit 26 hereto are true and correct copies of excerpts of Plaintiff Allen  
25 Robert Kelley's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
26 invoice(s), receipt(s), and/or other records produced by him in this action.

1           28.     Attached as Exhibit 27 hereto are true and correct copies of excerpts of Plaintiff  
2 Daniel Yohalem's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
3 and invoice(s), receipt(s), and/or other records produced by him in this action.

4           29.     Attached as Exhibit 28 hereto are true and correct copies of excerpts of Plaintiff  
5 Rodrigo Bazan Gatti's responses to Defendants' Interrogatories; deposition testimony; and  
6 invoice(s), receipt(s), and/or other records relevant to Plaintiff's purchase of product(s) containing  
7 SRAM.

8           30.     Attached as Exhibit 29 hereto are true and correct copies of excerpts of Plaintiff CHP  
9 Media, Inc.'s responses to Defendants' Interrogatories; excerpts of its deposition testimony; and  
10 invoice(s), receipt(s), and/or other records produced by it in this action.

11          31.     Attached as Exhibit 30 hereto are true and correct copies of excerpts of Plaintiff  
12 Curtis Hogue, Jr.'s responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
13 and invoice(s), receipt(s), and/or other records produced by him in this action.

14          32.     Attached as Exhibit 31 hereto are true and correct copies of excerpts of Plaintiff Ward  
15 Cater's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
16 invoice(s), receipt(s), and/or other records produced by him in this action.

17          33.     Attached as Exhibit 32 hereto are true and correct copies of excerpts of Plaintiff Beth  
18 O'Donnell's responses to Defendants' Interrogatories; excerpts of her deposition testimony; and  
19 invoice(s), receipt(s), and/or other records produced by her in this action.

20          34.     Attached as Exhibit 33 hereto are true and correct copies of excerpts of Plaintiff  
21 Carlos R. Carrillo's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
22 and invoice(s), receipt(s), and/or other records produced by him in this action.

23          35.     Attached as Exhibit 34 hereto are true and correct copies of excerpts of Plaintiff  
24 Javier Oyola-Aleman's responses to Defendants' Interrogatories; excerpts of his deposition  
25 testimony; and invoice(s), receipt(s), and/or other records produced by him in this action.

26          36.     Attached as Exhibit 35 hereto are true and correct copies of excerpts of Plaintiff  
27 Kevin Kicia's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
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1 invoice(s), receipt(s), and/or other records produced by him in this action.

2 37. Attached as Exhibit 36 hereto are true and correct copies of excerpts of Plaintiff  
3 Mitch Mudlin's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
4 invoice(s), receipt(s), and/or other records produced by him in this action.

5 38. Attached as Exhibit 37 hereto are true and correct copies of excerpts of Plaintiff  
6 Frank C. Warner's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
7 and invoice(s), receipt(s), and/or other records produced by him in this action.

8 39. Attached as Exhibit 38 hereto are true and correct copies of excerpts of Plaintiff  
9 Christopher K. Giauque's responses to Defendants' Interrogatories; excerpts of his deposition  
10 testimony; and invoice(s), receipt(s), and/or other records produced by him in this action.

11 40. Attached as Exhibit 39 hereto are true and correct copies of excerpts of Plaintiff  
12 Christopher Smith's responses to Defendants' Interrogatories; excerpts of his deposition testimony;  
13 and invoice(s), receipt(s), and/or other records produced by him in this action.

14 41. Attached as Exhibit 40 hereto are true and correct copies of excerpts of Plaintiff  
15 Donna Hark's responses to Defendants' Interrogatories; excerpts of her deposition testimony; and  
16 invoice(s), receipt(s), and/or other records produced by her in this action.

17 42. Attached as Exhibit 41 hereto are true and correct copies of excerpts of Plaintiff  
18 David Loomis's responses to Defendants' Interrogatories; excerpts of his deposition testimony; and  
19 invoice(s), receipt(s), and/or other records produced by him in this action.

20 43. Attached as Exhibit 42 hereto are true and correct copies of excerpts of Plaintiffs  
21 Mark and Shannon Schneider's responses to Defendants' Interrogatories; excerpts of their deposition  
22 testimony; and invoice(s), receipt(s), and/or other records produced by them in this action.

23 44. Attached as Exhibit 43 hereto are true and correct copies of excerpts of Plaintiff  
24 Christopher J. Stawski's responses to Defendants' Interrogatories; excerpts of his deposition  
25 testimony; and invoice(s), receipt(s), and/or other records produced by him in this action.

26 45. Attached as Exhibit 44 hereto is a true and correct copy of a letter from Research In  
27 Motion (RIM), dated April 1, 2009.

1           46.     Attached as Exhibit 45 hereto are true and correct copies of documents produced in  
2 this litigation with Bates numbers RIM 00001, RIM 00003-00009.

3           47.     Attached as Exhibit 46 hereto are true and correct copies of RIM product information  
4 available on RIM's website.

5           48.     Attached as Exhibit 47 hereto are true and correct copies of documents produced in  
6 this litigation with Bates numbers eCYP0482627-0482663.

7           49.     Attached as Exhibit 48 hereto are true and correct copies of documents produced in  
8 this litigation with Bates numbers CIS0016, CIS0018, and CIS0052.

9           50.     Attached as Exhibit 49 hereto is a true and correct copy of a web printout of the  
10 product features of the Cisco Aironet 1100 Series Access Point.

11           51.     Attached as Exhibit 50 hereto is a true and correct copy of a web printout regarding  
12 Cisco PIX 500 series and referencing SRAM cache.

13           52.     Attached as Exhibit 51 hereto are true and correct copies of documents produced in  
14 this litigation with Bates numbers RENESAS-SRAM-0069547, RENESAS-SRAM-0069550,  
15 RENESAS-SRAM-0069562-0069564.

16           53.     Attached as Exhibit 52 hereto is a true and correct copy of the characteristics of  
17 UtRAM (PSRAM) provided on Defendant Samsung's website.

18           54.     Attached as Exhibit 53 hereto are true and correct copies of a system overview for the  
19 Dell PowerEdge 1650 Systems provided on Dell's website.

20           55.     Attached as Exhibit 54 hereto are true and correct copies of product specifications for  
21 the Dell PowerEdge System provided on Dell's website.

22           56.     Attached as Exhibit 55 hereto are true and correct copies of documents produced in  
23 this litigation with Bates numbers eCYP0243342-0243361.

24           57.     Attached as Exhibit 56 hereto is a true and correct copy of a document produced in  
25 this litigation with Bates number eCYP1755590.

26           58.     Attached as Exhibit 57 hereto are true and correct copies of documents produced in  
27 this litigation with Bates numbers eCYP1143345, eCYP1143348.



1           59. Attached as Exhibit 58 hereto is a true and correct copy of documents produced in  
2 this litigation with Bates numbers SSI-0010095995, SSI-0010096022-0010096023.

3           60. Attached as Exhibit 59 hereto is a true and correct copy of the Objections of Nonparty  
4 D-Link Systems, Inc. to Subpoena by Indirect Purchaser Class for Documents, dated June 2, 2008.

5           61. Attached as Exhibit 60 hereto is a true and correct copy of a document produced in  
6 this litigation with Bates number CYP060172 - 060175.

7           62. Attached as Exhibit 61 hereto is a true and correct copy of a document produced in  
8 this litigation with Bates number CYP047643 - 047656.

9           63. Attached as Exhibit 62 hereto is a true and correct copy of a document produced in  
10 this litigation with Bates number CYP052027 - CYP052032.

11           64. Attached as Exhibit 63 hereto is a true and correct copy of a document produced in  
12 this litigation with Bates number CYP052066 - 052068.

13           65. Attached as Exhibit 64 hereto is a true and correct copy of a document produced in  
14 this litigation with Bates number CYP050942, CYP050990.

15           66. Attached as Exhibit 65 hereto is a true and correct copy of a document produced in  
16 this litigation with Bates number eCYP0218574, eCYP0218586.

17           67. Attached as Exhibit 66 hereto is a true and correct copy of a document produced in  
18 this litigation with Bates number eCYP0243305-0243306, eCYP0243311-0243312.

19           68. Attached as Exhibit 67 hereto is a true and correct copy of a document produced in  
20 this litigation with Bates number ETAMD L-0006421-0006430.

21           69. Attached as Exhibit 68 hereto is a true and correct copy of a document produced in  
22 this litigation with Bates number CYP052832 – CYP052839.

23           70. Attached as Exhibit 69 hereto are true and correct copies of documents produced in  
24 this litigation with Bates numbers eCYP0619582, eCYP0619592-0619596.

25           71. Attached as Exhibit 70 hereto are true and correct copies of documents produced in  
26 this litigation with Bates numbers eCYP0601383-0601387.

27           72. Attached as Exhibit 71 hereto are true and correct copies of documents produced in  
28

1 this litigation with Bates numbers eCYP0301095-0301099.

2 73. Attached as Exhibit 72 hereto are true and correct copies of documents produced in  
3 this litigation with Bates numbers eCYP0301783-0301787.

4 74. Attached as Exhibit 73 hereto are true and correct copies of documents produced in  
5 this litigation with Bates numbers eCYP0264254-0264258; eCYP0264271; eCYP0264291-0264294;  
6 eCYP0264308; and eCYP0264332.

7 75. Attached as Exhibit 74 hereto are true and correct copies of documents produced in  
8 this litigation with Bates numbers HSA\_SRAM0535037 - 0535045.

9 76. Attached as Exhibit 75 hereto is a true and correct copy of a document produced in  
10 this litigation with Bates number eCYP0243353.

11 77. Attached as Exhibit 76 hereto are true and correct copies of documents produced in  
12 this litigation with Bates numbers NECELAM-S 1632355, NECELAM-S 1632369-1632371,  
13 NECELAM-S 1632465-1632467.

14 78. Attached as Exhibit 77 hereto are true and correct copies of documents produced in  
15 this litigation with Bates numbers eCYP0635688-0635693.

16 79. Attached as Exhibit 78 hereto is a true and correct copy of a document produced in  
17 this litigation with Bates number eCYP0587897.

18 80. Attached as Exhibit 79 hereto are true and correct copies of documents produced in  
19 this litigation with Bates numbers NECELAM-S 1679746 -1679750.

20 81. Attached as Exhibit 80 hereto are true and correct copies of documents produced in  
21 this litigation with Bates numbers eCYP0216384, eCYP0216520-0216522.

22 82. Attached as Exhibit 81 hereto are true and correct copies of documents produced in  
23 this litigation with Bates numbers eCYP0654795-0654798.

24 83. Attached as Exhibit 82 hereto are true and correct copies of product specifications for  
25 the BCM VP1541 product provided on BCM's website.

26 84. Attached as Exhibit 83 hereto is a true and correct copy of a document produced in  
27 this litigation with Bates number eCYP0109615, eCYP0109654.

1           85.     Attached as Exhibit 84 hereto are true and correct copies of documents produced in  
2 this litigation with Bates numbers NECELAM-S 1626136-1626137.

3           86.     Attached as Exhibit 85 hereto is a true and correct copy of a document produced in  
4 this litigation with Bates number TAEC-S-216672.

5           87.     Attached as Exhibit 86 hereto are true and correct copies of documents produced in  
6 this litigation with Bates numbers ETAMDL-0065082-0065089.

7           88.     Attached as Exhibit 87 hereto is a true and correct copy of a document produced in  
8 this litigation with Bates number TAEC-S-302467-0001.

9           89.     Attached as Exhibit 88 hereto are true and correct copies of documents produced in  
10 this litigation with Bates numbers NECELAM-S 1866182, NECELAM-S 1866230-1866234.

11          90.     Attached as Exhibit 89 hereto are true and correct copies of documents produced in  
12 this litigation with Bates numbers eCYP0910668-0910671.

13          91.     Attached as Exhibit 90 hereto is a true and correct copy of a document produced in  
14 this litigation with Bates number RENESAS-SRAM-0293585.

15          92.     Attached as Exhibit 91 hereto is a true and correct copy of a document produced in  
16 this litigation with Bates number eCYP0294471.

17          93.     Attached as Exhibit 92 hereto is a true and correct copy of a document produced in  
18 this litigation with Bates number eCYP2371551-2371561.

19          94.     Attached as Exhibit 93 hereto is a true and correct copy of excerpts of the deposition  
20 of Michelle M. Burtis, Ph.D., in the *SRAM* litigation, dated June 5, 2009, and Exhibit 10 thereto.

21          95.     Attached as Exhibit 94 hereto is a true and correct copy of excerpts of the deposition  
22 of Mark Dwyer, Ph.D., in the *SRAM* litigation, dated April 2, 2009.

23          96.     Attached as Exhibit 95 hereto is a true and correct copy of a letter from 3Com, dated  
24 March 31, 2009.

25          97.     Attached as Exhibit 96 hereto is a true and correct copy of excerpts of the deposition  
26 of Michelle M. Burtis, Ph.D., in the *Smokeless Tobacco Cases I-IV*, dated October 28, 2003. This  
27 portion of Burtis' Declaration was filed conditionally under seal in the *Smokeless* case but was  
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1 unsealed pursuant to local rule when the defendant in that case did not seek to maintain the  
2 document under seal in the court record. I understand that it is publicly available at the San  
3 Francisco Superior Court.

4 98. Attached as Exhibit 97 hereto are true and correct copies of documents produced in  
5 this litigation with Bates numbers eCYP0528313, eCYP0528320-0528322.

6 99. Attached as Exhibit 98 hereto is a true and correct copy of a document produced in  
7 this litigation with Bates number SSI-0005170064.

8 100. Attached as Exhibit 99 hereto is a true and correct copy of Exhibit 3 to the deposition  
9 of Michelle M. Burtis, Ph.D., in the *SRAM* litigation, dated June 5, 2009.

10 101. Attached as Exhibit 100 hereto is a true and correct copy of excerpts from the  
11 deposition of K.C. Suh of Hynix, p. 168.

12 102. Attached as Exhibit 101 hereto is a true and correct copy of Exhibit 163 to the  
13 deposition of K.C. Suh with Bates number HSA\_SRAM0597611.

14 103. Attached as Exhibit 102 hereto is a true and correct copy of excerpts from the  
15 deposition of Roman Komanovsky of Hynix, dated May 18, 2009, pp. 254-255, 262-263.

16 104. Attached as Exhibit 103 hereto is a true and correct copy of excerpts from the  
17 deposition of Oomer Serang of Samsung, pp. 84-85, 164, 166, 168.

18 105. Attached as Exhibit 104 hereto is a true and correct copy of excerpts from the  
19 deposition of David Bagby of Samsung, pp. 242-243, 245-250.

20 106. Attached as Exhibit 105 hereto is a true and correct copy of excerpts from the  
21 deposition of O.S. Kwon of Samsung, pp. 54, 55-56, 78, 144-145, 158, 176-181, 202-204, 219, 225-  
22 226, 243-245.

23 107. Attached as Exhibit 106 hereto is a true and correct copy of Exhibit 150 to the  
24 deposition of O.S. Kwon of Samsung in the *SRAM* litigation.

25 108. Attached as Exhibit 107 hereto is a true and correct copy of excerpts from the  
26 deposition of Ik Jung Lee of Samsung, pp. 33-34.

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